## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

| JOHN DOE,   | ) Case No. 1:14-cv-02044               |
|---|--|
| Plaintiff,  | ) Judge Christopher A. Boyko           |
| v.<br>CASE WESTERN RESERVE UNIVERSITY,<br>et al., | ) JOINT MOTION FOR PROTECTIVE<br>ORDER |
| Defendants.                                       | )                                      |

Plaintiff John Doe and Defendants Case Western Reserve University, The Cleveland Clinic Foundation d/b/a Cleveland Clinic Lerner College of Medicine of Case Western Reserve University, and Kathleen Franco, M.D., by and through counsel, hereby respectfully request that the Court approve the attached Stipulated Protective Order (attached as Exhibit A) to allow for and facilitate the exchange of confidential documents and information in the above-captioned case.

Respectfully submitted,

| /s/ Terry H. Gilbert (per email consent) | /s/ Rebecca J. Bennett                         |
|--|--|
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## **CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2015, a copy of the foregoing *Joint Motion for Protective Order* was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Rebecca J. Bennett

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